

**REMARKS**

In the Office Action of April 4, 2006, the Examiner rejected claims 14 and 15, the only pending claims, under 35 U.S.C. §103(a) as being unpatentable over Tzidan et al. (U.S. Pat. No. 5,737,031) in view of Mellow (U.S. Pat. No. 3,691,676). Claims 14 and 15 have been amended to more particularly describe Applicant's invention in order to expedite allowance of the subject application.

The amendments to claims 14 and 15 add the limitation of recording the position of the camera taking the master shot image within the virtual production set relative to the action puppet character. Also, specifically set forth in the amended claims is the limitation that the close-up shot image is composited with a digitally created still image.

These two composited images are then combined so as to swap out different frames of various backgrounds for a given digitally created still image (back plate image) of a given frame image, thereby integrating the two composited images within one scene. In order to integrate the two composited images within one scene the position of the master shot camera within the virtual background set relative to the action puppet character must be known which is now a claim limitation in amended claims 14 and 15.

Neither Tzidon et al. or Mellow show or suggest the limitations that have been added to claims 14 and 15. Accordingly, it is submitted that the amended claims 14 and 15 are patentably distinct from the references of record, either alone or in combination and passage to issue of the amended claims is respectfully requested.

Respectfully submitted,

Dated: October 4, 2006

By:



Keith D. Nowak  
Attorney for Applicant  
Reg. No. 27,367  
Carter Ledyard & Milburn LLP  
2 Wall Street  
New York, NY 10005  
Telephone No.: (212) 238-8610  
Facsimile No.: (212) 732-3232